

ARZOL-13788



Karen Hoffman

06/03/2002 12:35 PM

To: Jodi Burgess/DC/USEPA/US@EPA

cc:

Subject: Commitment -- three files attached. Please give AR numbers. Thanks



Fred_McElDowney@a
mericanchemistry.co
m

04/12/02 03:20 PM

To: Barbara Leczynski/DC/USEPA/US@EPA

cc: Charles Auer/DC/USEPA/US@EPA,

Jim_Keith@americanchemistry.com,

Larry_Rampy@americanchemistry.com,

Steven_Russell@americanchemistry.com

Subject: ICCA HPV Commitments and EPA "ICCA Tentative" designations

02 JUN-3 PM 12:33

RECEIVED
EPA/DC/ICCA

In an effort to be as responsive as possible to the concerns expressed at our March 12 meeting, and to clear as many possible listings from EPA's "ICCA Tentative" list, I am providing the following:

1. A list of commitments made so far in 2002 (as of March 15), along with some corrections from earlier reports. 57 new commitments were made after January 1, 26 of which were listed on EPA's "ICCA Tentative" list. Registrations for 14 chemicals were not reported earlier, because of oversights. The corrections include four CAS numbers which were incorrectly reported on the January 31, 2002 report and six chemicals which were previously reported but which continue to be listed as "ICCA Tentative" by EPA.

(See attached file: Report 04-02.doc)

I intend to submit this report formally, but want your assurance that it contains the information you need.

2. A list of company consortia connections to assist EPA in clearing up the "ICCA Tentative" list. These address over 240 chemicals listed by EPA as "Tentative ICCA" commitments. Most of the registrations were reported in July 2000, when ICCA provided only the consortium name and technical contact. However, the information to verify claims by companies was readily available, either on the ICCA Tracking Site, or by asking the technical contact or me. In 14 cases the membership information was provided in our 12/31/2002 report.

(See attached file: Company-Consortia Links.doc)

The complete listing of ICCA consortia memberships can be found at the following website address:

<http://www.iccahpv.com/reports/ReportConsortiaList.cfm>

I would caution, however, that not all of the listings are up to date or accurate with respect to company names. If you have any questions, contact me or the technical contact for the consortium. It is a major reason why we have always stressed commitments to chemicals, and the party directly responsible for those commitments, in the ICCA program, rather than trying to track every company which might be associated with work on a given chemical.

Incidentally, you asked about the number of consortia and companies which have registered commitments under the ICCA HPV Initiative. By my count, 159 consortia and approximately 375 companies have registered commitments on the tracking site. The number of companies is uncertain, however, because of unclear corporate relationships, as well as mergers and

acquisitions whose effect has not been recorded on the site. The full list of consortia/company commitments can be found at the following website address:

<http://www.iccahpv.com/reports/SponsorConsortiumAllReport.cfm?RequestTimeout=6000>

I am submitting the information in this section informally, as an aid to EPA in making decisions about its "ICCA Tentative" listings.

3. I am also providing a list of informal comments with recommendations regarding the disposition of 115 chemicals on EPA's "ICCA Tentative" list. These comments are based on my reading of correspondence with EPA in the light of my understanding of the actual operation of the ICCA program, responses from technical contacts, and other sources of information. This effort was hampered by the large number of pieces of correspondence which could not be opened on the site.

Many of the needed clarifications arise because of a widespread practice of appointing a "lead company" in the ICCA program. This company is sometimes the only party which registers on the ICCA tracking site. In many cases we are aware of cooperation between this lead company and others. In other cases the cooperation is clear from correspondence with the agency. While we would not regard this information as sufficient to record a "firm" ICCA commitment, it should be used in making judgements about "tentative" commitments.

(See attached file: Additional Comments.doc)

If all of the recommendations I have made are accepted and the other information provided is used, listings for only 15 chemicals should remain on EPA's "ICCA Tentative" list. I intend to clear up those remaining cases as soon as possible.



Report 04-02.d Company-Consortia Lin Additional Comment

Updated and Corrected ICCA Registrations

<p>AEEA consortium within the Ethyleneamines Product Stewardship Discussion Group (EPSDG) – reported by EPA as Ethyleneamines Product Stewardship Discussion Group, AEEA Testing Consortium</p> <p>BASF AG; Dow Chemical Co., Inc.; Akzo Nobel Chemicals Inc., Huntsman Polyurethanes.</p>	<p>DUG/C-C 100, D-67056, Ludwigshafen</p> <p>Technical Contact:</p> <p>Hubert Lendle Phone: 49 (0) 621 50 44712 e-mail: hubert.lendle@basf-ag.de</p>	Aminoethylethanolamine (AEEA)	111411	2001
<p>Air Products and Chemicals, Inc.</p>	<p>7201 Hamilton Boulevard Allentown, PA 18195</p> <p>Technical Contact:</p> <p>Bronek Drozdowicz Phone: (610) 481-4260 e-mail: drozdozb@apci.com</p>	1,4-Diazabicyclo[2.2.2]octane	280579	2001
<p>*American Chemistry Council (ACC) Alkanolamines Panel</p> <p>Dow Chemical Company; Huntsman Corporation; Ineos LLC; Equistar Chemicals; BASF AG</p>	<p>1300 Wilson Boulevard, Arlington, VA 22209</p> <p>Technical Contact:</p> <p>Jon Busch Phone: (703) 741-5633 e-mail: Jon_Busch@americanchemistry.com</p>	Ethanol, 2-amino-	141435	2002
<p>*American Chemistry Council (ACC) Amines HPV Panel</p> <p>Air Products and Chemicals, Inc.; Atofina Chemicals, Inc.; BASF Corporation; Celanese Ltd.; E.I. DuPont de Nemours & Company; Huntsman Corporation; The Dow Chemical Company; UCB Chemicals Corporation; Union Carbide Company</p>	<p>1300 Wilson Boulevard, Arlington, VA 22209</p> <p>Technical Contact:</p> <p>John DiLoreto Phone: (703) 5615 e-mail: John_DiLoreto@americanchemistry.com</p>	Diisobutylamine – CAS number incorrectly reported 1/31/2002 as 198214	110963	2001

Updated and Corrected ICCA Registrations

American Chemistry Council Ethylene Glycol Ethers Consortium Eastman Chemical Company Inc., Equistar Chemicals, Shell Chemical Company, Dow Chemical Company.	1300 Wilson Boulevard, Arlington, VA 22209 Technical Contact: Susan Lewis Phone: 703-741-5635 e-mail: Susan_Lewis@americanchemistry.com	Diethylene Glycol Monoethyl Ether	111900	2001
*American Chemistry Council (ACC) Fluoroalkenes (FA) VDF Task Group Atofina Chemicals, Inc.; Ausimont USA, Inc.; Solvay S.A	1300 Wilson Boulevard, Arlington, VA 22209 Technical Contact: Wendy Sherman Phone: (703)741-5639 e-mail: Wendy_Sherman@americanchemistry.com	Vinylidene fluoride (VDF) This was reported by ICCA in July 2000 and on 1/31/2002, but continues to be reported as tentative by EPA.	75387	2003
American Chemistry Council Higher Olefins Panel BP Amoco, Chevron Phillips Chemical Company, CONDEA Vista, Sasol Technology (Pty) Ltd., Shell Chemicals Limited, Shell Chemical Company, Spolana a.s. Neratovice, Sunoco Inc.,	1300 Wilson Boulevard, Arlington, VA 22209 Technical Contact: Doug Anderson Phone: 703-741-5616 e-mail: Doug_Anderson@americanchemistry.com	1-Octadecene (reported 7/2000 as a BP Amoco commitment)	112889	2001
		1-Hexadecene (reported 7/2000 as a BP Amoco commitment)	629732	2001

Updated and Corrected ICCA Registrations

<p>*American Chemistry Council (ACC) Vinyl Chloride Health Committee (VCHC)</p> <p>Borden Chemicals & Plastics, Operating Limited Partnership; Formosa Plastics Corporation, USA; Georgia Gulf Corporation; Occidental Chemical Corporation; PPG Industries, Inc.; Solvay PVC; The Dow Chemical Company</p> <p>(support is also being given by the Vinyl Environmental Council, whose members include: Asahi Glass Co., Ltd.; Central Chemical Co., Ltd.; dKashima VCM Co., Ltd; Tokuyama Corporation; Tosoh Corporation; V- Tech Corporation)</p>	<p>1300 Wilson Boulevard, Arlington, VA 22209</p> <p>Technical Contact:</p> <p>Elizabeth Watson Phone: (703) 741-5629 e-mail: Elizabeth.Watson@americanchemistry.com</p>	Vinyl Chloride	75014	2001
<p>*American Chemistry Council (ACC) Specialty Acrylates and Methacrylates (SAM) HPV Work Group</p> <p>Akcros Chemicals; Atofina Chemicals, Inc.; BASF Corporation; Ciba Specialty Chemicals Corporation; Cognis Corporation; Rhodia Inc.; RohMax USA; Rohm GmbH; San Esters Corporation; Sartomer Company; UCB Chemicals Corporation</p>	<p>1300 Wilson Boulevard, Arlington, VA 22209</p> <p>Technical Contact:</p> <p>Anne LeHuray Phone: (703) 741-5630 e-mail: Anne.LeHuray@americanchemistry.com</p>	2-Propenoic acid, (1-methyl-1,2-ethanediyl)bis[oxy(methyl-2,1-ethanediyl)] este	42978665	2001

Updated and Corrected ICCA Registrations

American Chemistry Council Organoclays Panel Cimbar Performance Minerals; Elementis Specialties; Southern Clay Products; Sud-Chemie Inc.; Lamberti USA	1300 Wilson Boulevard, Arlington, VA 22209 Technical Contact: John Morris Phone: (703) 741-5631 e-mail: John_Morris@americanchemistry.com	Quaternary ammonium compounds, benzylbis(hydrogenated tallow alkyl)methyl, salts with bentonite	68153300	2001
		Quaternary ammonium compounds, bis(hydrogenated tallow alkyl)dimethyl, salts with bentonite	68953582	2001
American Chemistry Council Propylene Oxide/Propylene Glycol Consortium Dow Chemical Company; Lyondell Petrochemicals; Huntsman Corporation (membership left off 1/31/.2002 report)	1300 Wilson Boulevard, Arlington VA 22209 Technical Contact: Anne LeHuray Phone: (703) 741-5630 e-mail: Anne_LeHuray@americanchemistry.com	1,1'-oxydipropen-2-ol	110985	2000
		oxydipropenol	25265718	2000
		Propane 1,2 –diol	57556	2000
Angus Chemicals Company (acquired by Dow Chemical)	1500 E. Lake Cook Road Bufflao Grove IL Technical Contact: Kenneth Nitschke Phone: (989)636-2584 e-mail: kdnitsch@dow.com	1-nitropropane	108032	2001
		Nitromethane	75525	2001
		Nitroethane	79243	2001
		2-nitropropane	79469	2001

Updated and Corrected ICCA Registrations

*APAG/SDA Aliphatic Alcohols Consortium Albright & Wilson Surfactants Europe ; Amoco Corp.; Arizona Chemical Company; BASF Corporation; BP Amoco Corporation; Chattem Chemicals, Inc. (advised by consortium contact) ; Cognis Corporation ; Cognis Deutschland GmbH ; SASOL Olefins and Surfactants GmbH ; CONDEA Paterno ; CONDEA Vista Company ; Henkel Corporation Oleon nv ; Rhodia, Inc. ; Salim Oleochemicals Inc. ; Shell Chemical Corporation ; Shell Chemicals Ltd. ; Kao Corporation ; The Procter & Gamble Company (companies in blue are new additions)	1500 K Street NW, Suite 300, Washington, D.C. 20005 Technical Contact: Alvaro de Carvalho Phone: (202) 347-2900 e-mail: adecarvalho@sdahq.org	Aluminum Isopropylate	555317	2001
Bayer AG Corporation	DS-QUS, Geb. 9AA5; 5A368 Levendusen, GERMANY Technical Contact: Andrea Paetz Phone: 49 214 3072730 e-mail: andrea.paetz.ap@bayer-ag.de	Menthol	89781	2002
		Neomenthol	491010	2002
		(+) - neomenthol	2216526	2002
		(±) - isomenthol	3623527	2002
		(+) - menthol	15356602	2002
		(-) -neomenthol	20747493	2002
		(+) - neoisomenthol	20752345	2002
		(-) – neoisomenthol	64282888	2002
		Isomenthol	490993	2002
		neoisomenthol	491021	2002
		L-menthol	2216515	2002
		(±) - neomenthol	3623516	2002
		(±) - neoisomenthol	3623538	2002
		D-menthol	15356704	2002
		(-) – isomenthol	20752334	2002

Updated and Corrected ICCA Registrations

		(1S-(1alpha,2beta,5beta))-5-methyl-(1-isopropyl)cyclohexan-2-ol	23283978	2002
		DL-Menthol	1490046	2002
		potassium sodium 4,4'-bis[6-anilino-4-[bis(2-hydroxyethyl)amino]-1,3,5-triazin-2-yl]amino]stilbene-2,2'-disulphonate (listed by EPA as Blankophor BBH, Kaliumsalz)	70942017	2002
		Formaldehyde, reaction products with sulfonated 1,1'-oxybis[methylbenzene],sodium salts (listed by EPA as Baykanol SL)	90387578	2002
Bayer Corporation	100 Bayer Road Pittsburgh, PA 15205-9741 Technical Contact: Dr. Cynthia Graham Phone: (412)777-3933 cynthia.graham.b@bayer.com	Monochloropinacolone	13547701	2002
		1,1, -dichloropinacolone	22591215	2002
		Pinacolone	75978	2002
		Toluene-2,3-diamine	2687254	2002
		Toluene-3,4-diamine	496720	2002
BP Amoco Chemicals (EPA report on provisional ICCA commitments continued to use "BP" even though the company used the name BP Amoco in correspondence at least since 1999)	BP Research and Engineering Chertsey Road Sunbury on Thames Middlesex TW 16 7LN Technical Contact: David Chesneau Phone: 44(0)1932 763946 e-mail: chesnead@bp.com (correspondence with EPA has occurred through BP's US affiliate, even though ICCA registrations are under	Isophthalic Acid (reported by ICCA in 7/2000 but continues to be reported as tentative by EPA)	12915	2001
		Trimellitic Acid	528449	2001
		Trimellitic Anhydride	552307	2001

Updated and Corrected ICCA Registrations

		Acetic Acid (reported by ICCA 1/31/2002, but continues to be reported as tentative by EPA)	64197	2001
Catechol (Pyrocatechol) Consortium UBE Industries (America); Rhodia, Inc. (EPA report lists Borregaard Italy, but no reference is provided)	CN7500, 259 Prospect Plains Road, Cranbury, NJ 08512 Technical Contact: Glenn Simon Phone: (919)786-9999 e-mail: glenn.simon@us.rhodia.com	Catechol (ICCA reported registrations by UBE and Rhodia in 7/2000)	120809	2003
Chlorinated Paraffins Industry Association	1250 Connecticut Avenue, NW, Suite 700, Washington, DC 20036 Technical Contact: Robert Fensterheim Phone: 202-637-9040 e-mail: bobf@regnet.com	Paraffin oils, chloro	85422920	2002
Chloroformates/Acid Chlorides Consortium *SOCMA, BASF Corp., Crompton Corp., SNPE North America Inc., PPG Industries Inc. (listed by EPA as SOCMA Chloroformates/Acid Chlorides Consortium)	Lynne Jones SOCMA 1850 M Street, NW Suite 700 Washington, DC 20036 Phone: 202-721-4157 Email: jonesl@socma.com	Pivaloyl chloride (misreported by ICCA as 328202, 1/31/2002)	3282302	2002
		2-ethylhexyl chloroformate (misreported by ICCA as 24668131, 1/31/2002)	24668131	2002
CLER ECOSOL Coalition on LAB Alkylate Bottom Chemische Fabrik WIBARCO GmbH, CONDEA Vista, Sasol Italy S.p.A., Huntsman Corp., PETRESA, Quimica Venoco, C.A.	529 14 th Street, NW Suite 655 Washington, DC 22315 Technical Contact: John Heinze Phone: 202-737-0171 Fax: 202-737-8406 e-mail: jheinze@johnadams.com	Benzene, mono-C10-14 alkyl derivs., fractionation bottoms	85117415	1999

Updated and Corrected ICCA Registrations

<p>Dodecane – 12 – lactam Consortium</p> <p>Ube Industries, Ltd., Degussa – Huels AG; ATOFINA; EMS-Chemie; ATOFINA Chemicals, Inc.</p>	<p>c/o Degussa AG CO-PM-EHS Building 1137 PB 16 Marl Germany 45764</p> <p>Technical Contact:</p> <p>Dr. Rolf Ebert Phone: 49 2365-49-5941 e-mail: rolf.ebert@degussa-huels.de</p>	<p>Azacyclotridecan-2-one</p> <p>Reported 7/2000 as solely a Degussa commitment.</p>	947046	2000
<p>The Dow Chemical Company</p>	<p>2030 Dow Center, Midland, MI 48674</p> <p>Technical Contact:</p> <p>Kenneth Nitschke Phone: (989)636-2584 e-mail: kdnitsch@dow.com</p>	<p>1,1,2,2-Tetrachloroethane</p> <p>(reported by ICCA 12/31/02, but continues to be reported as tentative by EPA)</p>	79345	2002
<p>e-Caprolactam Consortium</p> <p>BASF AG; Bayer AG; DSM NV; Enichem S.p.a.; Honeywell; Mitsubishi Chemical Corporation; Sumitomo Chemical Company, Ltd.; Toray Industries, Inc.; Ube Industries Ltd.</p>	<p>BASF AG DUG/C-C 100, D-67056, Ludwigshafen</p> <p>Technical Contact:</p> <p>Hubert Lendle Phone: 49 (0) 621 50 44712 e-mail: hubert.lendle@basf-ag.de</p>	<p>Epsilon-Caprolactam</p> <p>(reported 7/2000, correctly, and 1/31/2002, but with CAS number 105062)</p>	105602	2000

Updated and Corrected ICCA Registrations

<p>Ethyleneamines Product Stewardship Discussion Group (EPSDG)</p> <p>Akzo Nobel Chemicals, Inc.; BASF Corporation; Delamine bv; Dow Chemical Company, Inc., Huntsman Polyurethanes; Tosoh Corporation.</p>	<p>1300 Eye Street, N.W., Suite 100 West Washington, D.C.</p> <p>Technical Contact:</p> <p>Lynn Bergeson Phone: (202) 962-8585 e-mail: lbergeson@lawbc.com</p>	<p>Hydroxyethylpiperazine (HEP)</p> <p>(incorrectly reported by ICCA 1/31/2002 as 130764)</p>	103764	2001
<p>*HEA/HPA Consortium</p> <p>Rohm and Haas Company; The Dow Chemical Company</p>	<p>Hunt Management Services, L.L.C. 941 Rhonda Place, S.E. Leesburg, VA 20175</p> <p>Technical Contact:</p> <p>Elizabeth Hunt Phone: (703) 669-5688 e-mail: ehunt@va.adelphia.net</p>	2-hydroxyethylacrylate	818611	2001
<p>HEMA Consortium</p> <p>Mitsubishi Gas Chemical Company; Mitsubishi Rayon; Rohm and Haas Company; Roehm GmbH; NIPPON SHOKUBAI, Co., Ltd.; LaPorte Performance Chemicals UK Ltd.</p>	<p>Mitsubishi Rayon 6-4 1 Konan 1 Chome, Minato-ku Tokyo, Japan 108-8506</p> <p>Technical Contact:</p> <p>Takashima Fumihisa Phone: 81 3 5495 3106 e-mail: takashima_fu@mrc.co.jp</p>	Hydroxyethyl methacrylate	868779	2001
<p>Hydrogen Solvents Industry Alliance (HSIA) International CTC Group</p> <p>Dow Chemical Company; Vulcan Chemicals; Ineos Chlor Ltd.</p>	<p>2001 L Street N.W., Suite 506A Washington, D.C. 20036</p> <p>Technical Contact:</p> <p>Paul Dugard Phone: (202) 775-0232 e-mail: pdugard@hsia.org</p>	Carbon Tetrachloride	56235	2002

Updated and Corrected ICCA Registrations

Hydrogen Solvents Industry Alliance (HSIA) International DCM Group Vulcan Chemicals; Shin-Etsu Chemical Company, Ltd.; Tokuyama Corporation; Aragonesas Industrias y Energ+AS.A.; Ercros; Solvay Chlor Chemicals; Dow Chemical Company; Ineos Chlor Ltd.; Asahi Glass Co., Ltd.; Akzo Nobel Chemicals bv; LII	2001 L Street N.W., Suite 506A Washington, D.C. 20036 Technical Contact: Paul Dugard Phone: (202) 775-0232 e-mail: pdugard@hsia.org	Methane, dichloro-	75092	2002
Hydrogen Solvents Industry Alliance (HSIA) International MCF Group PPG Industries Inc. Vulcan Chemicals	2001 L Street N.W., Suite 506A Washington, D.C. 20036 Technical Contact: Paul Dugard Phone: (202) 775-0232 e-mail: pdugard@hsia.org	Ethane, 1,1,1-trichloro	71556	2002
Hydrogen Solvents Industry Alliance (HSIA) International VDC Group Solvay Chlor Chemicals; Dow Chemical Company; Ineos Chlor Ltd.	2001 L Street N.W., Suite 506A Washington, D.C. 20036 Technical Contact: Paul Dugard Phone: (202) 775-0232 e-mail: pdugard@hsia.org	Ethylene, 1,1-dichloro	75354	2002
Industry Coalition on the OECD SIDS Assessment, LAS *Dial Corp., PETRESA, Colgate – Palmolive Co., Huntsman Corp., Quimica Venoco, C.A., Stepan Co., The Proctor & Gamble Co., Lever Brothers, CONDEA Vista, YPF, KAO Corp., Lion Corp.	529 14 th Street, N.W. Suite 655 Washington, DC 22315 Technical Contact: John Heinze Phone: 202-737-0171 Email: jheinze@johnadams.com	benzenesulfonic acid, c10-14 alkyl derivs., sodium salt	69669449	2001
		Benzenesulfonic acid, dodecyl-, sodium salt	25155300	2001
		Benzenesulfonic acid, tridecyl-, sodium salt	26248248	2001
		Benzenesulfonic acid, mono-C10-16-alkyl derivs., sodium salts	68081812	2001

Updated and Corrected ICCA Registrations

		Benzenesulfonic acid, C10-13-alkyl derivatives, sodium salts	68411303	2001
*Methacrylate Producers Association, Inc. (MPA)/CEFIC MTX Atofina Chemicals, Inc.; CYRO Industries; INEOS Acrylics; Rohm and Haas Company; Roehm GmbH ; BASF AG ; ATOFINA ; Repsol Quimica, S.A. (companies in blue added since last report)	Hunt Management Services, L.L.C. 941 Rhonda Place, S.E. Leesburg, VA 20175 Technical Contact: Elizabeth Hunt Phone: (703) 669-5688 e-mail: ehunt@va.adelphia.net	Methacrylic Acid, ethyl ester (reported 1/31/2002, but continues to be reported as tentative by EPA)	97632	2001
		Methacrylic Acid, I-butyl ester (reported 1/31/2002, but continues to be reported as tentative by EPA)	97869	2001
Resorcinol Task Force Sumitomo Chemical Company, Ltd.; Mitsui Chemicals, Inc.	2-27-1 Shinkawa, Chuo-ku Tokyo, Japan 104-8260 Technical Contact: Akira Okumura Phone: 81-3-5543-5197	1,3-Benzenediol (reported 7/2000 with a different technical contact)	108463	2000
Salicylic Acid Consortium Mitsui Chemicals, Inc.; Yoshitomi Fine Chemicals; Rhodia (France); Bayer AG	190 Avenue Thiers Lyon France 69006 Technical Contact: Marie Christine Rosset Phone: 33 1 47 68 21 31 e-mail: marie-christine.rosset@eu.rhodia.com	Salicylic Acid (reported 7/2000 as a commitment by Mitsui and Rhodia)	69727	2003
The Soap and Detergent Association (SDA)/CESIO Amine Oxide Consortium Akzo Nobel Chemicals Inc.; Crompton Corporation; Goldschmidt Corporation; Rhodia, Inc.; Stepan Company; The Procter & Gamble Company	1500 K Street NW, Suite 300, Washington, D.C. 20005 Technical Contact: Alvaro de Carvalho Phone: (202) 347-2900 e-mail: adecarvalho@sdahq.org	Dodecylamine, N,N-dimethyl-, N-oxide	1643205	2002
		Amines, C10-16-alkyldimethyl, N-oxide	70592802	2002

Updated and Corrected ICCA Registrations

<p>The Soap and Detergent Association (SDA)/CESIO Alkyl Sulfates Consortium</p> <p>Crompton Corporation; Pilot Chemical Company; Rhodia, Inc.; Stepan Company; The Dial Corporation; The Procter & Gamble Company</p>	<p>1500 K Street NW, Suite 300, Washington, D.C. 20005</p> <p>Technical Contact:</p> <p>Alvaro de Carvalho</p> <p>Phone: (202) 347-2900</p> <p>e-mail: adecarvalho@sdahq.org</p>	Sulfuric acid, monododecyl ester, compnd. with 2,2',2''-nitrilotriethanol (1:1)	139968	2002
		Sulfuric acid, mono-C10-16-alkyl esters, compds. with triethanolamine	117875771	2002
		Sulfuric acid, monododecyl ester, ammonium salt	2235543	2002
		1-Octanesulfonic acid, sodium salt	5324845	2002
		C8-18 alkyl sulfate, sodium salt	68130438	2002
		Sulfuric acid, mono-C12-18- alkyl esters, sodium salts	68955191	2002
		C16-18 alkyl sulfate, sodium salt	68955204	2002
		Sulfuric acid, mono-C10-16-alkyl esters, ammonium salts	68081969	2002
		Sulfuric acid, mono-C14-18-alkyl esters, sodium salts	68081981	2002
		Sulfonic acids, C14-16-alkane hydroxy and C14-16-alkene, sodium salts	68439576	2002
<p>The Soap and Detergent Association (SDA)/CESIO Hyrotropes Consortium</p> <p>Cognis Corporation; Crompton Corporation; Rhodia, Inc.; Rutgers Organics Corporation; Stepan Company; The Procter & Gamble Company</p>	<p>1500 K Street NW, Suite 300, Washington, D.C. 20005</p> <p>Technical Contact:</p> <p>Alvaro de Carvalho</p> <p>Phone: (202) 347-2900</p> <p>e-mail: adecarvalho@sdahq.org</p>	Sulfuric acid, mono-C10-16-alkyl esters, sodium salts	68585477	2002
		Xylenesulfonic acid, sodium salt	1300727	2001
		ar-Toluenesulfonic acid, sodium salt	12068030	2001

Updated and Corrected ICCA Registrations

		Xylenesulfonic acid, ammonium salt	26447109	2001
		ar-Cumenesulfonic acid, sodium salt	28348530	2001
		Benzene, (1-methylethyl)-monosulfo deriv., sodium salt	32073226	2001
		Benzenesulfonic acid, (1-methylethyl)-, ammonium salt	37475880	2001
Solvay S.A.	Rue de Ransbeek 310 Brussels, Belgium 1120 Technical Contact: Christ de Rooij Phone: 32 2 2642580 e-mail: christianus.dernii@solvay.com	1, 2, dichloroethane (reported by ICCA 1/31/2002, but not included in EPA summary report)	107062	2000
*Thioesters Association Atofina Chemicals, Inc.; Bruno Bock Chemische Fabrik GmbH & Co. KG; Crompton Corporation; Cytec Industries Inc.; EM Industries (an associate of Merck KgaA); Hampshire Chemical Corp (a subsidiary of Dow Chemical); Merck KgaA; Rohm and Haas Company	Hunt Management Services, L.L.C. 941 Rhonda Place, S.E. Leesburg, VA 20175 Technical Contact: Elizabeth Hunt Phone: (703) 669-5688 e-mail: ehunt@va.adelphia.net	2-Ethylhexy thioglycolate	7659861	2001
Vinyl Ether Consortium BASF AG; International Specialty Products, Inc.; Kyowa Hakko Kogyo Ltd.; Union Carbide Corporation (now Dow Chemical Co.) (membership left off 1/31/2002 report)	BASF AG DUG/C-C 100, D-67056, Ludwigshafen Technical Contact: Hubert Lendle Phone: 49 (0) 621 50 44712 e-mail: hubert.lendle@basf-ag.de	Isobutyl Vinyl Ether	109535	2001
		Ethyl Vinyl Ether	109922	2001

Company Memberships in Consortia

Company	Consortium	Date commitment reported by ICCA
Akzo Nobel – Surface Chemistry	SDA Amine Oxides Consortium	New
Akzo Nobel Functional Chemicals	ACC Chelants/Chelates Panel Ethyleneamines Product Stewardship Discussion Group (and AAEEA consortium)	7/2000 1/31/2002
Akzo Nobel Polymer Chemicals	SPI Organic Peroxide Producers Safety Division	New
Albemarle Corporation	ACC Monocyclic Amines and Nitro Aromatics (MAANA) Panel	See notes
Arch Chemicals, Inc.	ACC Pyridine and Pyridine Derivatives HPV Panel	7/2000
Arizona Chemical Company	APAG/SDA Aliphatic Alcohols Consortium	1/31/2002
ATOFINA Chemicals Inc.	European Fluorocarbon Technical Committee Isophorone Consortium Dodecane-12-lactam Consortium	7/2000 7/2000 New
Bayer AG Corporation	Epsilon-Caprolactam Consortium	7/2000 and 1/31/2002
Bayer Corporation	ACC Benzoates Panel	7/2000

Company Memberships in Consortia

BP Amoco Chemicals	ACC Higher Olefins Panel	7/2000
	ACC Hydrocarbon Solvents Panel	7/2000
	ACC Maleic Anyhdride Panel	7/2000
	ACC Toluene and Xylenes Panel	1/31/2002
Buffalo Color Corporation	ACC Monocyclic Aromatic Amines and Nitro Aromatics (MAANA)	See notes
Chattem Chemicals Inc.	APAG/SDA Aliphatic Alcohols Consortium	Not listed in 1/31/2002 report
Chevron Oronite Company LLC	ACC HERTG	7/2000
Chevron Phillips Chemical Company	International Hydrocarbon Solvents Consortium	7/2000
Clariant Corporation	USOC/ETAD Stilbene Flourescent Brighteners Consortium	See notes
Clariant LSM (Florida)	SEHSC	7/2000
Cognis Corporation (formerly Henkel)	APAG/SDA Aliphatic Alcohols Consortium	1/31/2002 (Company not reported as member at that time)
	SDA/CESIO Hydrotropes Consortium	New
	SDA CESIO Alkyl Sulfates Consortium	New
CONDEA Chemie GmbH	MEKO Consortium (for CAS no. 96-29-7)	7/2000

Company Memberships in Consortia

Crompton Corporation	SDA/CESIO Alkyl Sulfates Consortium	New
	SDA /(CESIO) Hydrotropes Consortium	New
The Dial Corporation	SDA/CESIA Alkyl Sulfates Consortium	New
The Dow Chemical Company	ACC Chelants/Chelates Panel	7/2000
	ACC Diisocyanates Panel	7/2000
	ACC Ethylene Glycol Ethers Panel	7/2000
	Propylene Glycol Ethers (status report has name incorrectly as "Esters")	7/2000
	Ethyleneamines Product Stewardship Discussion Group	1/31/2002
	HEA/HPA Consortium	New
	Halogenated Solvents Industry Alliance	New
Dow Corning Corporation	SEHSC	7/2000
Eastman Chemical Company	ACC Ethylene Glycol Ethers Panel	7/2000
Ethyl Corporation	ACC HERTG	Most 7/200, see new
ExxonMobil Chemical Company	International Hydrocarbon Solvents Consortium	7/2000
Georgia Gulf Corporation	ACC Vinyl Chloride Health Committee	1/31/2000

Company Memberships in Consortia

Huntsman Corporation	ACC Maleic Anhydride Panel	7/2000
	ACC Propylene Oxide, Propylene Glycol Panel	1/31/2002 (Company not reported as member at that time)
	Industry Coalition on the OECD SIDS Assessment of LAS	New
Huntsman Polyurethanes Group	ACC Diisocyanates Panel	7/2000
Ineos Acrylics	Methacrylate Producers Association	1/31/2002
The Lubrizol Corporation	ACC HERTG	7/2000
Lyondell Chemical Company	ACC Propylene Glycol Ethers Panel	7/2000
Petroquímica Española, S.A. (Petresa)	Council for LAB/LAS Environmental Research (CLER, Registered under two names, Petresa is a member of both consortia)	7/2000 and 1/31/2001
Phillips Petroleum Company	International Hydrocarbon Solvents Consortium	7/2000
PPG Industries	Chloroformates/Acid Chlorides Consortium	1/31/2002
The Procter & Gamble Company	APAG/SDA Aliphatic Alcohols Consortium	1/31/2002
	SDA/CESIO Alkyl Sulfates Consortium	New
	SDA/CESIO Hydrotropes Consortium	New
	SDA Amine Oxides Consortium	New

Company Memberships in Consortia

Reilly Industries, Inc.	ACC Pyridine and Pyridine Derivatives Panel	7/2000
Rhodia Inc.	SEHSC	7/2000
	APAG/SDA Aliphatic Alcohols Consortium	7/2000
	SDA/CESIO Hydrotropes Consortium	New
	SDA Amine Oxides Panel	New
Rohm and Haas Company	HEA/HPA Consortium	New
	HEMA Consortium	New
	Methacrylate Producers Association	7/2000, also see notes
	Thioesters Association	New
Rutgers Organics Corporation	SDA(/CESIO) Hydrotrope Consortium	New
Sartomer Company, Inc.	ASS Specialty Acrylates and Methacrylates (SAM) Work Group	7/2000 and new
Sasol North America, Inc. (formerly CONDEA Vista)	ACC Higher Olefins Panel	7/2000
	Council for LAB/LAS Environmental Research	1/31/2002
	International Hydrocarbon Solvents Connsortium	7/2000

Company Memberships in Consortia

Shell Chemical Company	ACC Hydrocarbon Solvents Consortium (not in ICCA Program, but Shell Ltd. is a member of the International Hydrocarbon Solvents Consortium, which is)	
	(ACC) Xylene Consortium	1/31/2002
	ACC Ethylene Glycol Panel	1/31/2002
	ACC Ethylene Glycol Ethers Consortium	7/2000
	ACC Higher Olefins Panel	1/31/2002
	Lesser Ketones Manufacturing Association	1/31/2002
	APAG/SDA Aliphatic Alcohols Consortium	1/31/2002
Shin-Etsu Silicones of America, Inc.	SEHSC	7/2000
Stepan Company	SDA/CESIO Alkyl Sulfates Consortium	New
	SDA/CESIO Hydrotropes Consortium	New
	SDA Amine Oxides Consortium	New
Sunoco, Inc.	SPI Organic Peroxides Panel	1/31/2002 (Company not reported as member at that time)

Company Memberships in Consortia

Union Carbide Corporation (now owned by Dow Chemical)	ACC Oxo Process Panel	1/31/2002
	ACC Ethylene Glycol Ethers Panel	7/2000
	Lesser Ketone Manufacturers Association	1/31/2002
Wacker Silicones Corporation	Silicones Environmental Health and Safety Council	7/2000
Witco GmbH (Now Crompton, Corp.)	ORTEP Stabilizer Task Force	7/2000

Additional Comments

HPV Challenge Summary Report – March 15, 2002

Air Products and Chemicals

Two of the four toluenes (misspelled in EPA report) listed, 2687254 and 496720 are registered on the ICCA website by Bayer Corporation. Bayer AG has registered a commitment for the third chemical, CAS number 25321146. The fourth toluene, 25376458, is being sponsored by Germany in the SIDS program.

Recent correspondence with Air Products cannot be opened on the EPA website. However, I have a copy of a December 20 letter from Air Products to EPA stating it is working with Bayer AG and Bayer Corporation on these four chemicals. Bayer makes clear in their letter of December 28, 2001 (201-13440) that they are working with Air Products and with Bayer AG on this group of chemicals.

The “tentative” designation for these chemicals associated with Air Products should therefore be removed.

Akzo Nobel Polymer Chemicals

No commitment for CAS number 75912, t-butyl hydroperoxide, has been registered on the ICCA tracking site. However, the chemical has a completed SIDS package and the Organic Peroxide Safety Division (which includes this company) stated in its letter of January 6, 2001 (201-12394), that the chemical is being used to supply information for the category. The “tentative” designation should be removed.

Albemarle Corporation

Bayer AG has registered commitments on the ICCA site to the three chemicals listed in this entry, CAS numbers 106940, 99990 and 95534. However, the Monocyclic Aromatic Amines and Nitro Aromatics (MAANA) panel (which includes Albemarle) makes clear in its November 22, 1999 (201-13198) letter that it is assisting in work on these chemical with Bayer as the lead company. They should be removed from the “tentative” list.

American Chemistry Council (ACC) Butylated Hydroxytoluene (BHT) Panel

Bayer AG has registered a commitment on the ICCA site to the chemical listed, CAS number 128370. However, the Panel’s letter of November 22, 1999 (201-11700) makes clear the panel is assisting Bayer in its work. It should be removed from the “tentative” list.

American Chemistry Council (ACC) Ethylene Glycol Ethers Panel (EGEP)

No commitment for CAS number 2807309 has been registered. Recent correspondence between the panel and EPA cannot be opened on the EPA site. I have asked the Panel manager responsible for a status report, but a family emergency has called her out of the office until the end of the month. The listing should remain as “tentative” for now.

Additional Comments

HPV Challenge Summary Report – March 15, 2002

American Chemistry Council (ACC) Monocyclic Amines and Nitro Amines (MAANA) Panel

As stated in the entry under Albemarle, above, Bayer AG has registered commitments on the ICCA site to the three chemicals listed in this entry, CAS numbers 106940, 99990 and 95534. However, the Monocyclic Aromatic Amines and Nitro Aromatics (MAANA) panel makes clear in its November 22, 1999 (201-13198) letter that it is assisting in work on these chemical with Bayer as the lead company. They should be removed from the “tentative” list.

American Chemistry Council (ACC) Toluenediamine & Dinitrotoluene (TDA & DNT) Panel

Bayer Corporation has registered commitments for two of the three chemicals listed, CAS number 2687254 and 496720. Bayer AG has registered a commitment for the third chemical, CAS number 25321146. However, the panel’s January 16, 2001 letter (201-12911) makes clear it is assisting Bayer, which is acting as the lead company. While the Panel itself has disbanded, its members continue the work, as reported in Air Products’ December 20 and Bayer Corporation’s December 28 (201-13440) letter to EPA. The Panel should be removed from the “tentative” list.

Angus Chemical Company

Dow Chemical Company has purchased this company. No commitments for the two CAS numbers listed, 124685 and 77861 have been registered on the ICCA site. I have asked Dow for a status report but have not yet received a reply. Until we have further information, they should remain on the “tentative” list.

ATOFINA Chemicals, Inc.

ATOFINA’s letter to EPA dated November 30, 1999 (201-11840) states it would be co-sponsoring chemicals with CAS numbers 2837890 and 75105 under the European Fluorocarbon Technical Committee (EFCTC) as part of the ICCA Initiative. However, the EFCTC’s own letter of the same date (201-11646) makes clear that while the consortium intends to submit SIDS dossiers, neither are on the ICCA working list and this work was of a lower priority than chemicals on the ICCA and US HPV lists. I understand that a SIDS assessment has been prepared for 2837890 under US sponsorship and that presentation to SIAM 15 is planned.

In any event, both chemicals should be removed from ATOFINA’s tentative ICCA commitment list.

Also, in another letter to EPA dated November 30, 1999 (201-11844), ATOFINA stated it was sponsoring a number of chemicals under SPI’s Organic Peroxide Producers Safety Division (OPPSD). While the list is not complete, Benzoyl Peroxide, CAS number

Additional Comments

HPV Challenge Summary Report – March 15, 2002

94360 may have been among them. However, the letter makes clear that sponsorship is being undertaken under the US HPV program, with a possible switch to ICCA in the future. Meanwhile the OPPSD letter of January 6, 2000 (201-12394) makes clear that this substance will remain in the US program because Korea is sponsoring it under OECD. Accordingly, Benzoyl Peroxide should be removed from ATOFINA's list of tentative ICCA commitments.

BASF AG

Basic Acrylic Monomer Manufacturers is cooperating with the CEFIC European Basic Acrylic Monomer group, which includes BASF AG as a member, in sponsoring CAS number 106638 in the ICCA Initiative (commitment reported 1/31/2002). The Vinyl Ether consortium, which also includes BASF AG, is sponsoring CAS numbers 109535 and 109922 (being reported as updated commitments). Accordingly, all three chemicals should be removed from the list of BASF AG tentative ICCA commitments.

BAYER AG

Bayer AG is a member of the ϵ -caprolactam consortium sponsoring epsilon-Caprolactam, CAS number 105602, as reported by ICCA 1/31/2002. This chemical should accordingly be removed from the list of Bayer's tentative ICCA commitments.

BP (Amoco Chemicals)

The Formic Acid consortium, which includes BP Amoco Chemicals, registered a commitment for CAS number 64186 (reported by ICCA, 7/2000). This chemical should accordingly be removed from the list of BP Amoco's tentative commitments.

No ICCA commitment has been registered for diethyl phthalate, CAS number 84662. I note that the chemical is being sponsored under the US HPV program by ACC's phthalate esters panel, but that BP Amoco suggested they would sponsor it under the ICCA program in a November 30, 1999 letter. I am checking with the technical contact for this company. Until I have further information, it should remain on the tentative ICCA list.

Buffalo Color

As stated in the entry under Albemarle, above, Bayer AG has registered commitments on the ICCA site to the three chemicals listed in this entry, CAS numbers 106940, 99990 and 95534. However, the Monocyclic Aromatic Amines and Nitro Aromatics (MAANA) panel, which includes Buffalo Color, makes clear in its November 22, 1999 (201-13198) letter that it is assisting in work on these chemical with Bayer as the lead company. They should be removed from the "tentative" list.

Celanese Ltd.

Additional Comments

HPV Challenge Summary Report – March 15, 2002

No commitment has been registered for CAS number 61361180. I am trying to contact Celanese to ascertain their plans. Until I have more information the chemical should continue to be listed as a tentative ICCA commitment.

Clariant (France)

No commitment has been registered for CAS number 298124. The letter referenced (201-13484) in the EPA summary report cannot be opened. I notice that a November 1, 1999 letter from DSM (201-11829) makes a commitment to the chemical under the US HPV challenge and reports they will be working with Clariant Corporation. I am trying to contact Celanese to ascertain their plans. Until I have more information the chemical should continue to be listed as a tentative ICCA commitment.

Condea Augusta S.p.a.

An e-mail sent to EPA on 1/23/2000 (201-12272) makes clear that Condea Augusta has made no commitments to EPA. Accordingly, all of the tentative ICCA commitments attributed to this company should be removed.

Incidentally, commitments to all of the chemicals in the list have been made and reported by ICCA to EPA, with the single exception of 8051307. A commitment has been made to this chemical has been made under the US HPV Challenge by the ACC FND Amides Panel.

Condea Chemie GmbH

Recent conversations with Condea have established that they viewed their original letter to the German Industry Association VCI (201-1200) as an offer to sponsor chemicals in cooperation with other companies, not a sponsorship commitment. Most of the chemicals listed in the EPA report have been sponsored and reported by ICCA. However, four chemicals listed have completed SIDS assessments, CAS number 102716, 111422, 111762, and 67630. No commitments have been registered for two other chemicals 1344281 and 73398615. All of the tentative commitments for this company should be removed.

Daiso Company Limited

Daiso has been added to the members of SPI's Epichlorhydrin Task Group, which has registered a commitment to CAS number 106898 (as reported 1/31/2002). The tentative commitment should be removed.

The Dow Chemical Company

I have asked for a report on Dow's commitments, but can add the following information for now:

Additional Comments

HPV Challenge Summary Report – March 15, 2002

107062 – Dow is cooperating in the provision of information, with Wacker, as the lead company and Solvay.

4719044 – Dow participated in the Triazine Joint Venture. On October 29, that group sent a letter to EPA (I don't believe it is posted on the summary report site) withdrawing the group's commitment to the chemical under the HPV challenge. Dow's subsequent listing of this chemical in its December 20 letter was an error.

74851 – Dow is a member of the LOSG CEFIC/Olefins Panel CMA (ACC), which registered a commitment to this chemical on the ICCA tracking site (reported 7/2000)

74873 – Dow is cooperating with Solvay as the lead company in the preparation of an assessment. Solvay's commitment is registered on the ICCA tracking site (reported 1/31/2002).

74831 – Dow is a member of the ACC Oxo Process Panel, which has registered a commitment to this chemical (reported 12/31/2002, with Union Carbide, now a Dow subsidiary).

All of the above should be removed from Dow's tentative ICCA list. The only chemical that should remain on the list (for now) is CAS number 3757764.

Eastman Chemical Company

As mentioned earlier, I am trying to determine the status of consideration of CAS number 2807309 from the ACC Ethylene Glycol Ethers Panel (which includes Eastman Chemical). Until I have further information, it should remain on the tentative list.

The Ethylidene Norborene (ENB) Consortium

A commitment to this chemical, CAS number 16219753, is registered on the ICCA tracking site (reported 1/31/2002) by Nippon Petrochemicals Company (NPC), which is listed as a member of this consortium. The two most recent correspondences with the consortium cannot be opened on the EPA site. However, I received a copy of a letter from ExxonMobil, the technical contact for the consortium, dated 11/19/2001 which reports that the consortium did support NPC in acting as the lead company for the consortium (the letter incorrectly lists the CAS number as 162753). The chemical was presented to SIAM 14 and should be removed from the list of tentative commitments.

ExxonMobil Chemical Company

The most recent correspondence with the company cannot be opened on the EPA site.

While ExxonMobil is a member of the ACC Higher Olefins Panel, it chose not to participate in the consortium formed to sponsor chemicals under the ICCA Initiative.

Additional Comments

HPV Challenge Summary Report – March 15, 2002

The tentative commitments for CAS numbers 25264931 and 27215958 should therefore be removed.

Exxon Mobil is a member of the CEFIC LOSG/ACC Olefins Panel, which has registered commitments to CAS numbers 115071, 106989, 513359 and 78795 (reported 7/2000). The company's correspondence refers inaccurately to the consortium as only the ACC Olefins Panel (which may have been the case when they were written).

Ethylidene Norbornene, which is addressed in the consortium heading of the same name immediately above, should also be removed from the ExxonMobil list of tentative commitments.

Hampshire Chemical Company

Dow Chemical Company acquired Hampshire. The ICA/SDIDA consortium registered commitments to the two chemicals listed, CAS numbers 142734 and 928723 (reported 1/31/02). Dow and Monsanto are the members of the consortium. The tentative listing for Hampshire should be removed.

Industrial Quimica del Nalon, S.A.

The letter from the company to EPA (201-12061, received 12/29/99) makes clear that the company was prepared to co-sponsor the six chemicals listed for the ICCA initiative (CAS numbers 65996772, 65996794, 65996932, 7757791, 8001589, and 90640861). Subsequent conversations with the company established that they were not successful in finding other companies with which to form a consortium. The tentative listings for this company should be removed.

Incidentally, the company also makes clear in its letter that the only chemical which it sends to the US, and which it volunteered to co-sponsor under the US HPV Challenge was naphthalene, CAS number 91-21-3. The listing for the company under "Full US HPV Commitments" is therefore erroneous.

Finally, a completed SIDS package is available for CAS number 65996932.

Ineos Acrylics

Ineos is a member of the Methacrylate Producer's Association, which registered a commitment for CAS number 978869 (reported 7/2000). However, Mitsubishi Rayon registered commitments for the other two chemicals listed, CAS numbers 688846 and 97881 (reported 7/2000). Mitsubishi Rayon is a member of the Methacrylate Producers Association. The Association's manager has told me that they are cooperating with Japan on two compounds, although she did not mention the CAS numbers. These chemicals should remain on the tentative list until the situation is clarified.

Additional Comments

HPV Challenge Summary Report – March 15, 2002

N-Butyl Ether Producers Association

I have asked the manager of this consortium for a status report on this chemical, CAS number 124961. No commitment for it has been registered on the ICCA tracking site. It should remain on the tentative list.

Occidental Chemical Corporation

Occidental reports that it has ceased production of sodium methoxide, CAS number 124414. The tentative ICCA listing should therefore be removed.

2,4 Pentanedione Producers Association (PDO Producers Association)

Wacker Chemie registered a commitment for the chemical listed, CAS number 123546, on the ICCA tracking site (reported 7/2000). Work was completed on the chemical and the assessment was submitted to SIAM 13. The tentative designation should therefore be removed. The most recent correspondence from the association on the EPA site cannot be opened, but I have a copy of a letter sent to EPA December 20 that reports this fact.

Phillips Petroleum Company

One of the items listed, CAS number 68551177, is listed as an ICCA commitment through the API HPV Testing Group. This group is not working through ICCA. Some of the chemicals being addressed by API are being addressed by other organizations, however, including through the ICCA Initiative. This chemical also appears, for example, among the commitments for the International Hydrogen Solvents Consortium (which were reported by ICCA in 7/2000). As reported elsewhere, Phillips is a member of this group.

All of the listings for Phillips should be removed.

PPG Industries, Inc.

The summary report suggests a tentative ICCA commitment for phosgene through the ACC Phosgene Panel. The two most recent communications from PPG cannot be opened. Phosgene is mentioned in the company's 11/30/99 letter to EPA (201-12031), but missing footnotes make it unclear what program the sponsorship was intended for. However, the Phosgene Panel itself has always been clear that it has committed only to the US HPV Challenge (see its letter of 4/18/2000, 201-12573). The listing should be removed.

No commitment has been registered on the ICCA tracking site for ethyl chloride. The tentative listing should therefore remain.

Additional Comments

HPV Challenge Summary Report – March 15, 2002

Rhodia, Inc.

The company reports it will review the situation with respect to TBEP, CAS number 78513 and report later. For now, it should remain on the tentative list.

Rohm and Haas Company

The company's letter of July 13, 2001 (201-13126) needs to be read carefully, and does contain several errors. However commitments to the following chemicals are clearly made under the US HPV program, not the ICCA:

143293
68955533
74862
141173
142165

Several of the chemicals listed already have completed SIDS, so no commitment under ICCA is needed. It is possible consortia are using them to assist in assessing categories. The SIDS chemicals appearing on the Rohm and Haas list are:

79107
75865
79414
80626

Rohm and Haas is a member of the HEMA consortium, which has registered a commitment to CAS number 868779 (newly reported listing). It is also a member of the Methacrylate Producers Association, which has registered a commitment to CAS number 97869 (reported 7/2000), the HEA/HPA Consortium, which has registered a commitment to CAS number 818611 (newly reported listing) and the Thioesters Association, which has registered a commitment to CAS number 7659861.

However, the December 18, 2001 letter from the Thioesters Association to EPA makes clear that its commitment to CAS number 68440244 is under the US HPV Challenge. Rohm and Haas erroneously reports this as a commitment to the ICCA Initiative.

All of the above listed chemicals should be removed from the Rohm and Haas tentative ICCA list.

Two tentative listings would thus remain. As explained above a commitment to CAS number 97881 was registered by Mitsubishi Rayon (reported 7/2000). Mitsubishi Rayon is also a member of the Methacrylate Producers Association. The Association's manager has told me that they are cooperating with Japan on two compounds, although she did not mention the CAS numbers. Also, the 2-Mercaptoethanol Consortium has registered a commitment to CAS number 60242 (reported 1/31/2000), but Rohm and Haas is not

Additional Comments

HPV Challenge Summary Report – March 15, 2002

listed as a participant. These two chemicals should remain on the tentative list until the situation is clarified.

Rohm GmbH

Rohm GmbH is a member of the Methacrylate Producers Association, which has registered commitments to CAS numbers 97632 and 97869 (reported 1/31/2002 with revised membership in newly reported listing). These should be removed from the tentative list.

Mitsui Chemical has registered a commitment to methacrylamide, CAS number 79390. I am attempting to find out whether Rohm GmbH is assisting in the preparation of the SIDS assessment, which is being sponsored by Japan. Until the situation can be clarified, the chemical should remain on the tentative list.

Sasol North America, Inc.

Although Sasol Technology (Pty), Ltd. is listed among the membership of the ACC Higher Olefins Panel, which is sponsoring CAS numbers 112889 and 629732, the original commitment was made by CONDEA Vista of the US and the panel manager informs me that the representative sitting on the panel comes from the US. The tentative designation for these two chemicals should be removed.

Sumitomo Chemical America, Inc.

Sumitomo Chemical Co., Ltd. is a member of the Resorcinol Task Force, which has registered a commitment to CAS number 108463. The tentative designation for this chemical should be removed.

Sunoco, Inc. (R&M)

Two of the items listed, CAS number 8032324 and 8052413 are listed as ICCA commitments through the API HPV Testing Group. As stated before, this group is not working through ICCA. These chemicals also appear among those sponsored by the International Hydrogen Solvents Consortium (which were reported by ICCA in 7/2000). Sunoco is a member of this group.

Tosoh Corporation

Air Products has registered a commitment for CAS number 280579 on the ICCA tracking site (on newly reported commitments list). Their December 21 letter to EPA (201-13393) reports that they are acting as a lead company. Tosoh reports in their March 15, 1999 letter (201-01463) that they are cooperating with Air Products in this work. The chemical should be removed from Tosoh's tentative list.

Additional Comments
HPV Challenge Summary Report – March 15, 2002

Union Carbide Corporation

Union Carbide has been acquired by Dow Chemical Company, which is in the process of revising records pertaining to its HPV commitments. Dow has promised a complete report. However, in the interim, I can make the following observations:

Degussa Huels AG has registered a commitment to CAS number 3268493 (reported 7/2000). I am trying to determine whether Dow is assisting in work on this chemical. Until the situation is clearer, it should remain on the tentative list.

No ICCA commitment has been registered for CAS number 590012. I am attempting to determine the status. Until the situation is clearer, it should remain on the tentative list.

The Oxo Process Panel withdrew its commitment to CAS number 116530 in its letter of 11/7/01 (201-13301), since the chemical is no longer HPV. It should be removed from the Union Carbide list of tentative ICCA commitments.

USOC/ETAD Stilbene Fluorescent Brighteners

Bayer AG has registered a commitment to CAS number 16470249 on the ICCA tracking site (reported 7/2000). USOC/ETAD's November 24, 1999 letter to EPA (201-11583) makes clear it is working on this chemical with Bayer as a lead company. It should be removed the list of tentative ICCA commitments.